REMARKS

The above amendments and these remarks are responsive to the final Office Action issued on September 7, 2005. By this response, claims 1, 3, 11, 16, 25, 41 and 58 are amended, and claim 60 is newly presented. No new matter is added. Claims 1-60 are now active for examination.

The Office Action

The Office Action dated September 7, 2005 rejected claims 1, 3-6, 8-12, 14, 25-34, 36-42, 49-53 and 55-59 under 35 U.S.C. §102(b) as being anticipated by Ooki et al. (U.S. Patent No. 5,822,518). The Office Action rejected claims 1-50 under 35 U.S.C. §103(a) as being unpatentable over Rosenow et al. (U.S. Patent No. 5,483,596) in view of Imai et al. (U.S. Patent No. 5,870,467). Claims 2, 13, 15-20 and 35 were rejected under 35 U.S.C. §103(a) as being unpatentable over Ooki et al. in view of Dustan et al. (U.S. Patent No. 5,884,312). The Examiner rejected claims 21-24 and 43-45 under 35 U.S.C. §103(a) as being unpatentable over Ooki et al. and Dustan et al., and further in view of Sprecher (U.S. Patent No. 5,285,494). Claims 7, 46-48 and 54 rejected under 35 U.S.C. §103(a) as being unpatentable over Ooki et al. in view of Dauerer et al. (U.S. Patent No. 5,627,967).

The Telephone Interview

The Examiner is thanked for the courtesy for granting a telephone interview on November 29, 2005. During the telephone interview, differences between the claims and the documents of record were discussed. The Examiner **agreed** that the documents of record do not teach or suggest the features related to granting a user access to a function of a software application based on the role of the user or a function to be performed by the user. The

17

Examiner suggested presenting one or more claims including these features, to achieve allowance. Furthermore, the Examiner agreed that the features described in the independent claims are not available in the documents of record, but carefully cautioned the possibility of possible features available in a stand-alone software application. The Examiner suggested amending the independent claims to direct to multiple-application architecture, which would sufficiently differentiate the claims from the publications of record and/or possible features available in stand-alone software applications.

By this Response, the claims are amended as discussed during the telephone interview. In view of interview, the amendments and/or remarks presented herein, Applicants respectfully submit that the rejections are overcome.

The Anticipation Rejection of 1, 3-6, 8-12, 14, 25-34, 36-42, 49,-53 and 55-59 Is Overcome

Claims 1, 3-6, 8-12, 14, 25-34, 36-42, 49-53 and 55-59 were rejected as being anticipated by Ooki. By this Response, independent claims 1, 25 and 41 are amended following the Examiner's advice during the interview. As agreed upon during the Interview, Ooki cannot support a prima facie case of anticipation because Ooki fails to disclose every limitation of claim 1.

Claim 1, as amended, recites:

> A system for selectively granting access to the functionality of a plurality of software applications to a plurality of users, the system comprising:
> a first memory configured to store first data related to each of the plurality of software applications, and second data specifying entitlements of each of the plurality of users to access functions of the software applications; and
> a rules checker in communication with the software applications and the first memory, said rules checker configured to:
> receive at least one query, said query originating from any particular one of the software applications, wherein the query is generated in response to an input received from one of the plurality of users with respect to the particular software application, and

forward a message to the particular software application in response to the query, wherein the message is generated based on the query and the second data;

wherein said message provides instructions to the particular software application regarding entitlements of the one of the plurality of users to access a particular function of the particular software application.

Appropriate support for the amendment can be found in, for instance, Figs. 1, 2 and 4, and page 8, fourth paragraph of the written description.

Therefore, an exemplary system of claim 1 interfaces between a plurality of software applications and a plurality of users. In response to an input from one of the users to a particular one of the software applications, a query is generated by the particular software application. In response to the generated query, the exemplary system generates and forwards a message to the particular software application. The message provides instructions to the particular software application regarding entitlements of the one of the plurality of users to access a particular function of the particular software application.

As <u>acknowledged by the Examiner during the telephone interview</u>, Ooki does not meet all the requirements of claim 1. For instance, although the system in Ooki uses a privilege table to identify access privileges of users, the privileges are related to specific restricted data, <u>not</u> to <u>**a**</u> <u>**particular function**</u> of <u>**a particular software application**</u>, as described in claim 1. Since Ooki fails to disclose every limitation of claim 1, Ooki cannot support a prima facie case of anticipation. The anticipation rejection is untenable and should be withdrawn. Favorable reconsideration of claim 1 is respectfully requested.

Claims 3-6, 8-12, 14, 42, 49-53 and 55-59, directly or indirectly, depend on claim 1, and incorporate every limitation thereof. Therefore, for at least the same reasons as for claim 1, claims 3-6, 8-12, 14, 42, 49-53 and 55-59, also are patentable over Ooki. Favorable reconsideration of 3-6, 8-12, 14, 42, 49-53 and 55-59, is respectfully requested.

Independent claims 25 and 41 include descriptions substantially similar to those of claim 1 with regard to entitlement of the user to access a function of a particular software application. Accordingly, claims 25 and 41 also are patentable over Ooki for at least the same reasons as for claim 1, as well as based on their own merits. Claims 26-34 and 36-40, directly or indirectly, depend on claim 25 and incorporate every limitation thereof. Consequently, claims 26-34 and 36-40 also are patentable over Ooki based on their dependencies of claim 25. Favorable reconsideration of claims 25-34 and 36-40 is respectfully requested.

The Obviousness Rejection based on Rosenow and Imai Is Overcome

Claims 1-50 were rejected as being unpatentable over Rosenow in view of Imai. By this Response, independent claims 1, 25 and 41 are amended. As agreed upon during the interview, the obviousness rejection is respectfully traversed because the Office Action failed to establish a prima facie case of obviousness.

Rosenow pertains to a system that utilizes encrypted communications when authorizing a user computer to access protected data. Though a privilege level of a user is determined before an authorization is granted, Rosenow does <u>not</u> teach or suggest that the privilege check is related to granting access to <u>a particular function of a particular software application</u>, as described in claim 1. The other cited patent, Imai, describes a copyright control system that selectively allows programs to perform read/write on copyrighted materials. According to Imai, a registration table is used to register each program's privilege to access copyrighted materials. See Fig. 23 and col. 23, ln. 54 through col. 24, ln. 29 of Imai. Noticeably, the registration table described in Imai specifies privilege levels associated with <u>a program</u>, not <u>a user</u>, as described in claim 1. Moreover, similar to the deficiency of Rosenow, Imai's system only describes restricting access to copyrighted materials, and does **not** specifically teach accessing <u>a particular</u>

function of a specific software application based on information related to the user's entitlements to access the particular function of the software application, as described in claim 1.

Accordingly, Rosenow and Imai, even if combined, still fail to disclose the feature of controlling access to functions of application software, as described in claim 1. Hence, Rosenow and Imai cannot support a prima facie case of obviousness. The Obviousness rejection of claim 1 is untenable and should be withdrawn. Favorable reconsideration of claim 1 is respectfully requested.

Claims 2-50 either incorporate every limitation of claim 1 based on their dependencies, or include limitations substantially similar to those of claim 1 regarding entitlements of a user to access a function of a software application. Consequently, claims 2-50 also are patentable over Rosenow and Imai for at least the same reasons as for claim 1, as well as based on their own merits. Favorable reconsideration of claims 2-50 is respectfully requested.

The Obviousness Rejection based on Ooki et al. and Dustan et al. Is Overcome

Claims 2, 13, 15-20 and 35 were rejected under 35 U.S.C. §103(a) as being unpatentable over Ooki in view of Dustan. As agreed upon during the interview, the obviousness rejection is respectfully traversed because Ooki and Dustan cannot support a prima facie case of obviousness.

Claims 2, 13 and 15-20, directly or indirectly, depend on claim 1 and incorporate every limitation of claim 1. As discussed earlier relative to claim 1, Ooki fails to teach producing an instruction regarding entitlements of a user to access a particular function of a specific software application, the feature of which is incorporated into claims 2, 13 and 15-20 by virtue of their dependencies on claim 1.

Dustan was cited by the Examiner for describing various functions including using a relational database, recording system activities and administering data accessed by users. However, Dustan does not alleviate the deficiency of Ooki for failing to disclose providing instructions to the particular software application regarding entitlements of one of the users to access a particular function of the particular software application, as described claims 2, 13 and 15-20.

Therefore, Ooki and Dustan, even if combined, do not include every limitation of claims 2, 13 and 15-20. Accordingly, the obviousness rejection of claims 2, 13 and 15-20 is untenable and should be withdrawn. Favorable reconsideration of claims 2, 13 and 15-20 is respectfully requested.

The Obviousness Rejection based on Ooki, Dustan and Sprecher Is Overcome

Claims 21-24 and 43-45, directly or indirectly, depend on claim 1, and were rejected as being unpatentable over Ooki and Dustan, and further in view of Sprecher. The obviousness rejection is respectfully overcome because Ooki, Dustan and Sprecher cannot support a prima facie case of obviousness.

As discussed earlier, Ooki and Dustan, even combined, fail to teach providing instructions to the particular software application regarding entitlements of one of the users to access a particular function of the particular software application, as described in claims 21-24 and 43-45 by virtue of their dependencies on claim 1.

Sprecher does not alleviate the deficiencies of Ooki and Dustan. In the Office Action, the Examiner cited various paragraphs of Sprecher for purportedly describing recording data alteration history, performing auditing processes, or providing real-time updates to altered data. The cited sections of Sprecher, however, do not disclose providing instructions to the particular

22

software application regarding entitlements of one of the users to access <u>a particular function of the particular software application</u>, as described in claims 21-24 and 43-45.

Consequently, Ooki, Dustan and Sprecher, even if combined in the way suggested by the Examiner, fail to meet every limitation of claims 21-24 and 43-45, and hence cannot support a prima facie case of obviousness. Applicants submit that claims 21-24 and 43-45 are patentable over Ooki, Dustan and Sprecher. Favorable reconsideration of claims 21-24 and 43-45 is respectfully requested.

The Obviousness Rejection based on Ooki and Dauerer Is Overcome

Claims 7, 46-48 and 54, indirectly depend on claim 1, and were rejected as being unpatentable over Ooki in view of Dauerer. Applicants respectfully traverse the obviousness rejection because Ooki and Dauerer cannot support a prima facie case of obviousness.

By virtue of their dependencies on claim 1, claims 7 and 46-48 include features related to providing instructions to the particular software application regarding entitlements of one of the users to access <u>a particular function of the particular software application</u>. As discussed earlier relative to claim 1, Ooki does not teach this feature.

The other cited patent, Dauerer, fails to alleviate the deficiency of Ooki. The paragraphs of Dauerer that were cited by the Examiner merely describe possible hierarchical divisions of data resources or files, or purported filtering data based on parameters specified in the registration table. The cited sections in Dauerer, however, do not disclose providing instructions to the particular software application regarding entitlements of one of the users to access <u>a particular function of the particular software application</u>, as described in claims 7 and 46-48. Therefore, Ooki and Dauerer, even if combined, do not meet every limitation of claims 7 and 46-

48. Accordingly, claims 7 and 46-48 are patentable over Ooki and Dauerer. Favorable reconsideration of claims 7 and 46-48 is respectfully requested.

New Claim 60 IS Patentable

By this Response, claim 60 is newly presented as suggested by the Examiner during the telephone interview. Specifically, claim 60 describes detailed mechanism for granting access functions of software applications, such as based on the role of a user or a function to be performed by the user. As agreed upon during the interview, the documents of record do not teach of suggest this feature in combination with other limitations of claim 60. Favorable consideration of claim 60 is respectfully requested.

For the reasons given above, Applicants believe that this application is in condition for allowance, and Applicants request that the Examiner give the application favorable reconsideration and permit it to issue as a patent. However, if the Examiner believes that the application can be put in even better condition for allowance, the Examiner is invited to contact Applicants' representative listed below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

McDERMOTT WILL & EMERY LLP

Wei-Chen Chen.

Wei-Chen Nicholas Chen
Registration No. 56,665

**Please recognize our Customer No. 20277
as our correspondence address.**

600 13th Street, N.W.
Washington, DC 20005-3096
Phone: 202.756.8000 WC:apr
Facsimile: 202.756.8087
Date: January 5, 2006

25